

**EXHIBIT A**

**Proposed Order**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

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In re: :  
:  
THE FINANCIAL OVERSIGHT AND : PROMESA  
MANAGEMENT BOARD FOR PUERTO RICO, : Title III  
:  
as representative of : Case No. 17-BK-3283 (LTS)  
:  
THE COMMONWEALTH OF PUERTO RICO *et al.*, : (Jointly Administered)  
:  
Debtors.<sup>1</sup> :  
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**ORDER EXPEDITING CONSIDERATION OF URGENT JOINT MOTION FOR  
ENTRY OF ORDER APPROVING STIPULATION AND AGREED ORDER BY AND  
AMONG FINANCIAL OVERSIGHT AND MANAGEMENT BOARD, ITS SPECIAL  
CLAIMS COMMITTEE, AND OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS RELATED TO JOINT PROSECUTION OF CERTAIN CAUSES OF  
ACTION OF PUERTO RICO HIGHWAYS AND TRANSPORTATION AUTHORITY  
AND EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE  
COMMONWEALTH OF PUERTO RICO**

Upon the *Urgent Joint Motion for Expedited Consideration of Urgent Joint Motion for  
Entry of Order Approving Stipulation and Agreed Order By and Among Financial Oversight and  
Management Board, Its Special Claims Committee, and Official Committee of Unsecured  
Creditors Related to Joint Prosecution of Certain Causes of Action of Puerto Rico Highways and  
Transportation Authority and Employees Retirement System of the Government of the*

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

*Commonwealth of Puerto Rico* (the “Urgent Motion”);<sup>2</sup> and the Court having found and determined that: (i) the Court has jurisdiction to consider the Urgent Motion and the relief requested therein pursuant to section 306 of PROMESA; (ii) venue is proper before this Court pursuant to section 307(a) of PROMESA; (iii) cause exists to shorten the notice period as requested in the Urgent Motion; (iv) due and proper notice of the Urgent Motion has been provided under the particular circumstances and no other or further notice need be provided; (v) any objections to the relief requested in the Urgent Motion having been withdrawn or overruled; and (vi) after due deliberation and sufficient cause appearing therefor, it is **HEREBY ORDERED THAT:**

1. The Urgent Motion is **GRANTED** as set forth herein.
2. A hearing on the Approval Motion is hereby scheduled for **May [\_\_], 2019 at [p./a.]m. (Atlantic Standard Time)** in \_\_\_\_\_.
3. Objections or responses, if any, to the Approval Motion must be filed and served (in accordance with the Case Management Procedures) by **May [\_\_], 2019 at [p./a.]m. (Atlantic Standard Time)**.
4. Replies to any objections or responses must be filed and served (in accordance with the Case Management Procedures) by **May [\_\_], 2019 at [p./a.]m. (Atlantic Standard Time)**.
5. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.
6. The Parties are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order.

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<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Urgent Motion.

7. The Court retains jurisdiction over any disputes relating to the interpretation or implementation of this Order.

Dated: May\_\_\_\_, 2019

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HONORABLE LAURA TAYLOR SWAIN  
UNITED STATES DISTRICT JUDGE